

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

BEIJING MEISHE NETWORK TECHNOLOGY
CO., LTD.,

Plaintiff,

v.

TIKTOK INC., TIKTOK PTE. LTD.,
BYTEDANCE LTD., and BYTEDANCE INC.,

Defendants.

Case No. 6:21-CV-504

JURY TRIAL DEMANDED

EX PARTE MOTION TO EXTEND DEADLINE TO SERVE DEFENDANTS

Plaintiff Beijing Meishe Network Technology Co., Ltd., by and through counsel of record, pursuant to Fed. R. Civ. P. 4(m), files this Ex Parte Motion to Extend Deadline to Serve Defendants TikTok Inc. (“TikTok Inc.”), TikTok Pte. Ltd. (“TikTok Pte. Ltd.”), ByteDance Ltd. (“BL”), and ByteDance Inc. (“BI”) (collectively, “Defendants”) and respectfully shows unto the Court the following:

I.

1. Because no parties have been served in the case, Plaintiff files the instant Motion ex parte.
2. Plaintiff filed its initial Complaint on May 18, 2021. (Dkt. 1).
3. The parties in this case have co-pending litigation in China, and during the time after the filing of the initial Complaint in this case, Plaintiff’s counsel in China was in communication with counsel for Defendants to determine if the case could be resolved without requiring Defendants to respond by serving them. It was subsequently determined that service would be required.
4. Plaintiff worked diligently with its counsel to update the claims and allegations in its Complaint.

5. Plaintiff filed its First Amended Complaint on August 4, 2021 (Dkt. 6), and then filed its Motion for Leave to file the Second Amended Complaint on August 10, 2021. (Dkt. 7).

6. The Court granted Plaintiff's Motion for leave on August 12, 2021 and Plaintiff's Second Amended Complaint will be docketed by the Clerk.

7. The deadline for service upon Defendants is August 16, 2021, just two (2) business days after the operative Complaint in this case was filed.

8. Plaintiff requires additional time to serve Defendants.

9. Therefore, Plaintiff requests that the Court extend the deadline to serve Defendants by ninety (90) days to November 14, 2021.

II.

This Motion is not made for the purpose of delay but so that justice may be done. Defendants will not be prejudiced by an extension.

WHEREFORE, Plaintiff respectfully requests that this Court extend the deadline to serve Defendants by ninety (90) days to November 14, 2021.

Date: August 16, 2021

Respectfully Submitted,

/s/ J. Mark Mann

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